

REMARKS

By this Amendment, Applicant adds new claims 14-24, and hence claims 2-24 are all the claims pending in the application.

Claim Rejections - 35 U.S.C. § 103

Claims 2-7 and 9-13 are rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Takeshi (US Patent App. 2002/0158970) in view of Cohen et al. (US Patent App. 2002/0108118, hereinafter "Cohen") and further in view of Sato (US Patent App. 2001/0017652). Applicant respectfully traverses the rejection.

Claims 2, 4, 5, 7-11, and 13

In the Office Action, the Examiner asserts that Takeshi allegedly teaches the claimed feature of "the image information transmission means has a function to transmit the identification information in association with the acquired image information to a plurality of data processing devices," as recited in claim 2. Specifically, the Examiner asserts that the wireless communication unit 6 of the camera transmits information to a second wireless communication unit 9 of the external storage unit 8. The Examiner also asserts that the external storage unit may be one of various PCs, PDAs, or cellular phones. *See* Office Action, page 3.

Takeshi describes that a communication link is established between the wireless communication unit 6 of the camera and the second wireless communication unit 9 of the storage unit 8. *See* Takeshi, ¶ 94. The established communication link comprises a master/slave relationship, with one of the devices set to be a master and the other device set to be a slave. *See* Takeshi, ¶ 95. When the communication "link between the 2 two units has established," then transmission proceeds. *See* Takeshi, ¶ 97.

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Therefore, Takeshi neither teaches nor suggests an image information transmission means which transmits information to a plurality of data processing devices. Rather, Takeshi merely discloses that the camera may transmit information to one, single external storage device. The Examiner appears to cite to paragraph 50 of Takeshi for teaching communication to a plurality of data processing devices. *See* Office Action, page 3. However, that portion of Takeshi merely lists “examples” of different types of devices that the external storage unit may comprise. Indeed, the Examiner’s assertion merely amounts to a conclusory statement not supported by any evidence in Takeshi, since Takeshi does not disclose that the camera transmits to a plurality of devices.

Instead, Takeshi specifically discloses a one-to-one communication link between only two total units, one unit being the camera and the other unit being one external storage unit. Indeed, Takeshi discloses that the electronic pickup and the external storage device keep information for confirming each other through the use of mutual IP addresses. *See* Takeshi, ¶ 51. As a result, Takeshi clearly fails to teach communications with plural external devices.

Furthermore, Takeshi discloses that communication between the camera and external storage device is accomplished through the use of IP addresses. A person having ordinary skill in the art would understand that the communication between the camera and external storage device would be controlled by the IP addresses of the devices. Therefore, there is no need to also include “identification information unique to the photography device,” as recited in claim 2 along with the transmission of image information.

Accordingly, for at least the above reasons, Takeshi fails to teach “the image information transmission means has a function to transmit the identification information in association with

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the acquired image information to a plurality of data processing devices.” Cohen and Sato similarly fail to teach such a feature, and hence the combination of Takeshi, Cohen, and Sato would not have rendered claim 2, or any of the claims that depend on claim 2, unpatentable.

Independent claim 4 recites features similar to those discussed above, and hence the combination of Takeshi, Cohen, and Sato would not have rendered claim 4, or any of the claims that depend on claim 4, unpatentable for at least analogous reasons.

Claims 5 and 7

With further regard to claims 5 and 7, the Examiner asserts that page 6, paragraph 70 of Cohen allegedly teaches the feature of “wherein the data processing device classifies the encoded image information for each piece of the identification information, and stores the classified encoded image information in the storage means.” *See* Office Action, page 8.

However, Cohen neither teaches nor suggests the data processing device classifies the encoded image information for each piece of the identification information. Rather, Cohen merely discloses that a DDST device downloads the entire contents of a camera’s memory and processes the data so that the data is retrievably stored in the DDST device’s storage medium. Cohen neither teaches nor suggests the data processing device classifies the encoded image information for each piece of the identification information, since Cohen merely discloses a memory dump from the camera to a storage medium. Indeed, there is no teaching or suggestion that the image information downloaded to the DDST device are classified, or organized, according to any type of identification information.

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Accordingly, for at least the above additional reasons, Cohen fails to cure the deficient disclosures of Takeshi and Sato, and hence the combination of Takeshi, Cohen, and Sato would not have rendered claims 5 and 7 unpatentable.

Claims 3, 4, 6, 7, 12, and 13

Claim 3 recites the feature of “wherein each of the photography devices operate independently of each other.” However, in the Office Action, the Examiner does not specify any portion of Takeshi, Cohen, or Sato for allegedly teaching this feature. While the Examiner appears to assert that paragraph 59 of Cohen allegedly teaches a plurality of photography devices, Cohen neither teaches nor suggests that the photography devices operate independently of each other. Rather, Cohen discloses that a single DDST device may control the capturing devices. Therefore, since Cohen discloses that the single DDST source controls the capturing devices, a person having ordinary skill in the art would understand that the devices are not operating independently of each other.

Takeshi and Sato similarly fail to teach such a feature, and hence the combination of Takeshi, Cohen, and Sato would not have rendered claim 3, or any of the claims that depend on claim 3, unpatentable.

Claim 4 recites features similar to those discussed above, and hence the combination of Takeshi, Cohen, and Sato would not have rendered claim 4, or any of the claims that depend on claim 4, unpatentable for at least analogous reasons.

Claim 8 is rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Takeshi in view of Cohen and Sato and further in view of Dutta (US Patent App. 2003/0076408).

Applicant respectfully traverses the rejection.

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Claim 8 depends on claim 2 and incorporates all the features of claim 2. Dutta is merely cited for teaching a processing engine that corrects distortions. Even if Cohen and Sato could have somehow been modified based on Dutta, the combination would still not teach all the features of claim 2, and hence claim 8, as discussed above. Accordingly, the combination of Cohen, Sato, and Dutta would not have rendered claim 8 unpatentable.

New Claims

As discussed above, Applicant adds new claims 14-24. Applicant respectfully submits that new claims 14-23 should be deemed patentable at least by virtue of their dependency. Further, Applicant respectfully submits that neither Takeshi, Cohen, Sato, nor Dutta, taken alone or in combination, teach or suggest the all the features recited in claims 14-24.

Also, in the Notice of Non-Compliant Amendment, the Examiner indicates that the Amendment dated May 22, 2008 adds new claims 14-24 but does not specifically point out the support in the specification for the newly added limitations and claims. *See* Notice of Non-Compliant Amendment, p. 2.

Applicants respectfully submit that claims 14 and 15 are at least supported by the exemplary embodiments of the present invention illustrated in FIG. 2B and the accompanying discussion from line 6, page 20 to line 25, page 21 of Applicants' disclosure.

Applicants respectfully submit that claims 16 and 17 are at least supported by the exemplary embodiments of the present invention illustrated in FIGS. 3 and 4 and the accompanying discussion from line 1, page 26 to line 8, page 27 of Applicants' disclosure.

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Applicants respectfully submit that claim 18 is at least supported by the exemplary embodiments of the present invention described at lines 9 to 24 at page 27 of Applicants' disclosure.

Applicants respectfully submit that claim 19 is at least supported by the exemplary embodiments of the present invention illustrated in FIG. 4 and the accompanying discussion at lines 17 to 25 of page 28 of Applicants' disclosure.

Applicants respectfully submit that claim 20 is at least supported by the exemplary embodiments of the present invention illustrated in FIG. 5 and the accompanying discussion from line 20, page 29 to line 4, page 30 of Applicants' disclosure.

Applicants respectfully submit that claim 21 is at least supported by the exemplary embodiments of the present invention illustrated in FIG. 6 and the accompanying discussion from line 15, page 30 to line 20, page 31 of Applicants' disclosure.

Applicants respectfully submit that claim 22 is at least supported by the exemplary embodiments of the present invention illustrated in FIGS. 3 and 4 and the accompanying discussion from line 1, page 26 to line 8, page 27 of Applicants' disclosure, as well as the exemplary embodiments of the present invention illustrated in FIG. 6 and the accompanying discussion from line 15, page 30 to line 20, page 31 of Applicants' disclosure.

Applicants respectfully submit that claim 23 is at least supported by the exemplary embodiments of the present invention described at line 21, page 31 to line 17, page 32 of Applicants' disclosure.

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Applicants respectfully submit that claim 24 is at least supported by the exemplary embodiments of the present invention illustrated in FIG. 8 and the accompanying discussion from line 5, page 35 to line 12, page 36 of Applicants' disclosure.

Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

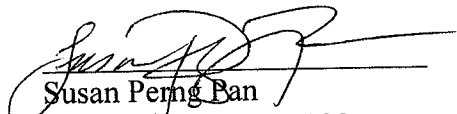
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